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To Kelly Sherman/DC/USEPA/US@EPA
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bcc

Subject Rodenticide Risk Mitigation Measures

History:

✉ This message has been replied to and forwarded.

Kelly,

I'd like to again thank you for taking the time to talk with us last week about risk mitigation measures for the rodenticide cluster. As we indicated in the meeting, NPMA is interested in finding solutions to the issues that you have identified, without compromising the ability of pest control operators to effectively manage rodent populations. In response to your request, I'd like to take this opportunity to reiterate the proposals we discussed:

1. **Bittering Agents:** After extensive consultations with industry professionals and a review of the available data on the palatability of baits containing bittering agents, NPMA would support the addition of bittering agents in any product labeled for indoor residential use (including professional and consumer products). We do not support the inclusion of bittering agents in products labeled for use in non-residential commercial, industrial or institutional settings. Because of the proliferation of alternative food sources in those settings, we believe the inclusion of bittering agents would significantly diminish bait acceptance. In addition, we believe that children's exposure to rodent bait is an issue in residential, but not commercial settings.
2. **Outdoor Uses:** Most rodenticides used by PCOs outside of structures are in commercial settings like food handling, storage and processing facilities. We strongly believe that we need the ability to use these products outside of the structure, inasmuch as the goal of rodent control in commercial settings is to prevent the rodent from entering the structure. That notwithstanding, NPMA would support the following mitigation measures with respect to products registered for use outside of structures:


- **Rodenticides may only be used outside of a structure by a certified or private applicator or person working under his/her direct supervision. (i.e., label language indicating that "this product may only be used by a certified applicator or person working under his/her direct supervision" or "this product may only be used by or sold to a certified applicator or person working under his/her direct supervision").**
- **Rodenticides must be used in tamper resistant bait boxes, or otherwise placed in locations not accessible to children, pets, wildlife or domestic animals.**

In particular, we believe the aforementioned mitigation measures will have a significant impact on the use of these products in that their outdoor use will be restricted to licensed and trained persons whose activities are routinely monitored by state regulatory officials and who are subject to enforcement action if the product is not used in accordance with label directions. In addition, the language assures that products will be used in a manner that will eliminate any possible route of direct exposure by non-target species.

3. **Stewardship: NPMA supports the product stewardship proposal submitted to you in July by the Rodenticide Registrants Task Force.**

We believe that these proposals constitute a comprehensive solution to the children's exposure and non-target species issues that you have identified. We would welcome the opportunity to answer any questions or meet with you again if you need any additional information.

Bob

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